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did knowingly employ, use, persuade, induce, entice, and coerce a minor, that is, KB, and did attempt to employ, use, persuade, induce, entice, and coerce said minor to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, and the defendant, **ERIC FLORES**, produced

such visual depiction by use of materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

(18 U.S.C. § 2252 (a)(2) and (b)(1))

(Receipt and Distribution of Material Involving the Sexual of Exploitation Children)

Beginning on or about February 4, 2015 and continuing through and including on or about March 6, 2015, in the Western District of Texas and elsewhere, Defendant,

ERIC FLORES,

did knowingly receive and distribute, and attempt to receive and distribute visual depictions of persons under the age of eighteen (18) engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), which had been transported in interstate and foreign commerce, to wit: by computer, and the producing of which involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

COUNT THREE

(18 U.S.C. § 2252(a)(4)(B))

(Possession of Material Involving the Sexual Exploitation of Children)

On or about March 6, 2015, in the Western District of Texas, Defendant,

ERIC FLORES,

knowingly possessed matter containing one or more visual depictions involving the use of a person under the age of eighteen (18), engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), which visual depictions had been transported in interstate and foreign commerce, to wit: by computer, and were produced using materials which had been shipped and transported in interstate and foreign commerce by any means, including by

computer, and the producing of which involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, in violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE
(18 U.S.C. § 2253)

As a result of the foregoing criminal violations set forth in Counts One, Two and Three, the United States of America gives notice to the Defendant,

ERIC FLORES,

of its intent to seek forfeiture, pursuant to Title 18, United States Code, Section 2253, of all right, title and interest of the defendant in any and all visual depictions described in Title 18, United States Code, Sections 2251, 2251A, or 2252, and any and all books, magazines, periodicals, films, videotapes, and other matters which contain any such visual depiction, which were produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, Part I, United States Code; any property, real and personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real and personal, used or intended to be used to commit or to promote the commission of such offenses, and any property traceable to such property.

A TRUE BILL
ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

GRAND JURY FOREPERSON

RICHARD L. DURBIN, JR.
ACTING UNITED STATES ATTORNEY

By


Assistant United States Attorney